UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

INSIGNIA SYSTEMS, INC.,

Plaintiff,

v.

NEWS CORPORATION, NEWS AMERICA MARKETING FSI L.L.C., and NEWS AMERICA MARKETING IN-STORE SERVICES L.L.C.,

Defendants.

Case No.: 19-cv-1820 MJD/BRT

JURY TRIAL DEMANDED

PLAINTIFF'S CROSS-MOTION FOR JUDGMENT ON THE PLEADINGS

Plaintiff Insignia Systems, Inc., through its attorneys, cross-moves the Court for judgment on the pleadings pursuant to Fed. R. Civ. P. 12(c). Insignia bases this motion on all of the files, records, and proceedings of this action, and the briefing and supporting materials, which will be filed and served in accordance with the Federal Rules of Civil Procedure and Rule 7.1 of the Local Rules.

Dated: November 11, 2019 Respectfully submitted,

/s/ Arun Subramanian

Jerry W. Blackwell (MN Bar No. 186867) S. Jamal Faleel (MN Bar No. 320626) BLACKWELL BURKE P.A. 431 South Seventh Street, Suite 2500 Minneapolis, MN 5 5415

Tel: 612-343-3200 Fax: 612-343-3205

blackwell@blackwellburke.com

jfaleel@blackwellburke.com

Daniel E. Gustafson (#202241)
Michelle J. Looby (#0388166)
Joshua J. Rissman (#0391500)
GUSTAFSON GLUEK PLLC
120 South 6th Street, Suite 2600
Minneapolis, Minnesota 55402
Telephone: (612) 333-8844
Fax: (612) 339-6622
dgustafson@gustafsongluek.com
mlooby@gustafsongluek.com
jrissman@gustafsongluek.com

William Christopher Carmody (pro hac vice) New York Bar No. 4539276 Arun Subramanian (pro hac vice) New York Bar No. 4611869 Mark Musico (pro hac vice) New York Bar No. 5238001 Y. Gloria Park (pro hac vice) New York Bar No.: 5477047 SUSMAN GODFREY LLP 1301 Avenue of the Americas, 32nd Floor New York, New York 10019 Telephone: (212) 336-3330 Fax: (212) 336-8340 bcarmody@susmangodfrey.com asubramanian@susmangodfrey.com mmusico@susmangodfrey.com GPark@susmangodfrey.com

Alejandra C. Salinas (pro hac vice) Texas Bar No. 24102452 SUSMAN GODFREY LLP 1000 Louisiana Street, Suite 5100 Houston, Texas 77002 Tel: (713) 651-9366 Fax: (713) 654-6666 asalinas@susmangodfrey.com

Hunter Shkolnik (pro hac vice) NAPOLI SHKOLNIK PLLC 360 Lexington Avenue, 11th Floor New York, New York 10017 Telephone: (212) 397-1000 hunter@napolilaw.com

Attorneys for Insignia Systems, Inc.